

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RANDEEP SINGH KHALSA, Individually
and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

THE CHILDREN'S PLACE, INC., JANE
ELFERS, and SHEAMUS TOAL,

Defendants.

Civil Action No.: 24-1182 (EP)(CLW)

Document Electronically Filed

**STIPULATION AND ORDER RE
DISMISSAL**

WHEREAS, on February 28, 2024, plaintiff Randeep Singh Khalsa ("Plaintiff") filed the above-captioned securities fraud class action asserting claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. § 78j(b) and 78t(a), and SEC Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5 (ECF No. 1);

WHEREAS, by Consent Order dated April 16, 2024, this Court directed Plaintiff and Defendants The Children's Place, Inc., Jane Elfers, and Sheamus Toal (collectively, the "Parties") to meet and confer and jointly submit for the Court's approval, within fourteen days of the Court's entry of an order appointing a lead plaintiff and lead counsel, a proposed schedule for the filing of any consolidated or amended complaint, Defendants' response to the same, and all briefing or other submissions associated with any motion to dismiss the operative complaint (ECF No. 6);

WHEREAS, by Order dated September 18, 2024, the Court appointed Plaintiff as Lead Plaintiff (hereinafter, "Lead Plaintiff"), and approved his selection of Glancy Prongay & Murray LLP as Lead Counsel and Carella, Byrne, Cecchi, Brody & Agnello, P.C. as Liaison Counsel for the putative class (ECF No. 18);

WHEREAS, on October 2, 2024, the Parties submitted a Stipulation and Order for Filing of Amended Complaint and Moving or Otherwise Responding to Amended Complaint (“Scheduling Stipulation”) setting forth proposed deadlines for the Lead Plaintiff to file an amended complaint and for the Parties’ anticipated motion to dismiss briefing thereon (ECF No. 20);

WHEREAS, the Court approved the Scheduling Stipulation on October 3, 2024 (“Scheduling Order”) (ECF No. 21);

WHEREAS, the deadline to file Lead Plaintiff’s consolidated complaint is November 18, 2024 pursuant to the Scheduling Order, but Lead Plaintiff has decided to voluntarily dismiss the above-captioned action in its entirety and with prejudice pursuant to Federal Rule of Civil Procedure 41(a);

WHEREAS, the Parties have agreed that each party shall bear its own costs and attorneys’ fees and that no party asserts that any of the Parties or their respective counsel have at any time failed to comply with Rule 11 of the Federal Rules of Civil Procedure; and

WHEREAS, the Parties have not exchanged monetary consideration or agreed to any terms other than what are set forth in this document in connection with this voluntary dismissal.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for Plaintiff and Defendants, as follows:

1. The above-captioned action is dismissed in its entirety and with prejudice; and
2. The Parties shall each bear their own costs and attorneys’ fees.

// REMAINDER OF PAGE INTENTIONALLY LEFT BLANK //

Respectfully submitted this 18th day of November 2024, by:

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.**

s/ James E. Cecchi

James E. Cecchi
Donald A. Ecklund
Kevin G. Cooper
5 Becker Farm Road
Roseland, New Jersey 07068
Tel: (973) 994-1700
decklund@carellabyme.com

GLANCY PRONGAY & MURRAY LLP

Robert V. Prongay
Charles H. Linehan
Pavithra Rajesh
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Tel: (310) 201-9150

*Attorneys for Plaintiff
Randeep Singh Khalsa*

GIBBONS P.C.

s/ Samuel I. Portnoy

Samuel I. Portnoy
One Gateway Center
Newark, New Jersey 07102-5310
Tel: (973) 596-4879
sportnoy@gibbonslaw.com

**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

Audra J. Soloway
Daniel J. Kramer
Staci Yablon
Jennifer Gilbert
1285 Avenue of the Americas
New York, New York 10019-6064
Tel: (212) 373-3289
Fax: (212) 492-0289
asoloway@paulweiss.com
dkramer@paulweiss.com
syablon@paulweiss.com
jgilbert@paulweiss.com

*Attorneys for Defendants
The Children's Place, Inc.,
Jane Elfers, and Sheamus Toal*

SO ORDERED

s/Evelyn Padin

Evelyn Padin, U.S.D.J.

Date: 11/20/2024